

Akin Gump

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March 15, 2016

National Freedom of Information Officer
U.S. Environmental Protection Agency
1301 Constitution Avenue, NW
Room 6416 West
Washington, D.C. 20004

Re: Freedom of Information Act Request for Records Pertaining to
Premanufacturing Notice P-14-0627

Dear EPA FOIA Officer:

This is a request under the Freedom of Information Act (FOIA), 5 U.S.C. § 552(a), as implemented by the U.S. Environmental Protection Agency (USEPA) at 40 C.F.R. Part 2, Subpart A et seq. by Akin Gump Strauss Hauer & Feld, LLP. Pursuant to the Freedom of Information Act, 5 U.S.C. § 552(a), please provide all documents and correspondence¹ responsive to the following requests:

1. Please provide the full and complete administrative record related to USEPA's review of the Premanufacturing Notice (PMN) for the chemical substance ("PMN Substance") submitted on June 19, 2014, and assigned EPA under Case No. P-14-0627 ("The PMN Review Process"), including:
 - a. Copies of the initial Chemistry Report; any subsequent modifications, revisions, and updates to the Chemistry Report; and all Documents and Communications related to USEPA's preparation of any such Chemistry Report during the PMN Review Process.
 - b. All Documents and Communications related to any Chemical Review and Search Strategy (CRSS) meeting held during the PMN Review Process.

¹ For the purposes of this request, the term "Documents and Communications" means any record, electronically stored information, or other written material, including books, research papers, treatises, publications, memos, reports, emails, notes (handwritten and electronic), other written communications, voicemails, drawings, graphs, charts, sound recordings, images, and other data or data compilations. The terms "includes" or "including" mean "including, but not limited to."

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- c. All Documents and Communications related to any meeting or communication among the Structure-Activity Team (SAT), including scientific information, data, search results from the scientific literature for human and ecological hazard identification and environmental fate conducted during the PMN Review Process.
 - d. All Documents and Communications related to USEPA's Chemical Engineering Branch (CEB) estimation of potential human exposure (both occupational and general population) and environmental exposure due to manufacture, processing, and industrial or commercial use of the PMN Substance. This shall include the following:
 - i. Results of the USEPA's Chemical Screening Tool for Exposures and Environmental Releases (ChemSTEER) software, and any updates or revisions based on new or modified data or modeling parameters;
 - ii. The Initial Review Engineering Report (IRER) and any updates or revisions;
 - iii. Results of the USEPA's Exposure and Fate Assessment Screening Tool (E-FAST) and any updates or revisions based on new or modified data or modeling parameters; and
 - iv. The Initial Review Exposure Report (IRExR) and any updates or revisions.
2. All Documents and Communications related to any Focus Meeting in which the PMN substance is a topic, including:
- a. Any information, policies, or directives related to social and economic factors considered during the PMN Process in characterizing and/or assessing potential adverse health or ecological effects resulting from exposures to the PMN substance.
 - b. Any information on concerns for harm to health or the environment from use or exposure to the PMN substance.
 - c. Standard Review Reports on Chemistry; Human Health Hazard Assessment; Ecological Assessment; Engineering; Exposure and Fate; and Risk

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Assessment including any information related to analogs of the PMN substance, and any updates or revisions to such Reports during the PMN Process.

- d. Any Economics Report comparing the PMN chemical to other commercial products
 - e. The final Standard Review Report
3. All Documents and Communications related to any Division Directors' meeting in which the PMN Substance is a topic, including the following:
- a. The Meeting Agenda.
 - b. The Division Directors' Briefing Paper.
 - c. Division Directors' Decision Document.

In accordance with the applicable regulations, we will pay a fee for the reasonable costs associated with producing the documents and other information above. We kindly request the USEPA notify us, in advance, if it anticipates the fee will exceed \$1,000.00.

Thank you very much for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles L. Franklin", with a long horizontal flourish extending to the right.

Charles L. Franklin